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5 Attorney for Defendant
MIGUEL ANGEL SANCHEZ
6

7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE EASTERN DISTRICT OF CALIFORNIA
9

10 UNITED STATES OF AMERICA,)
11 Plaintiff,) Case No. CR.S-04-381-FCD
12 v.)
13)
14 MIGUEL ANGEL SANCHEZ, et al.,) Date: June 20, 2005
15 Defendant.) Time: 9:30 a.m.
16) Judge: Honorable Frank C. Damrell

17 IT IS HEREBY STIPULATED by and between the parties hereto through
18 their respective counsel, SAMUEL WONG, Assistant United States
19 Attorney, attorney for Plaintiff, MARK J. REICHEL, CHRIS HAYDEN-MAYER,
20 ESQ., JESSE ORTIZ, ESQ., attorneys for defendants Miguel Angel Sanchez,
21 Ricardo Salas, Oscar Canizales, that the previously scheduled change of
22 plea hearing date of May 31, 2005 be vacated and the matter set for
23 change of plea on June 20, 2005 at 9:30 am.

24 This continuance is requested because defense counsel Reichel
25 will be out of town on training May 31st through June 6th. As well, all
26 defense counsel also need additional time to review discovery with the
27 defendant, conduct legal research, perform background factual
28 Stip and Order

1 investigation, and properly prepare for a potential change of plea.

2 Accordingly, all counsel and the defendant agree that time under
3 the Speedy Trial Act from the date this stipulation is lodged, through
4 June 20, 2005, should be excluded in computing the time within which
5 trial must commence under the Speedy Trial Act, pursuant to Title 18
6 U.S.C. § 3161 (H)(8)(B)(iv) and Local Code T4. Additionally, there is
7 a motion pending in the magistrate court which is scheduled for July
8 15, 2005, so time will be excluded under Local Code E up until that
9 time, July 15, 2005.

10 DATED: May 27, 2005.

Respectfully submitted,

11 QUIN DENVER
12 Federal Public Defender

13 DATED: May 27, 2005.

14 /s/MARK J. REICHEL
15 MARK J. REICHEL
Assistant Federal Defender
Attorney for Defendant

16 /s/MARK J. REICHEL
17 CHRISTOPHER HAYDEN MEYER, ESQ
18 Attorney for Defendant

19 /s/MARK J. REICHEL
20 JESSE ORTIZ, ESQ
21 Attorney for Defendant

22 McGREGOR SCOTT
23 United States Attorney

24 DATED: May 27, 2005.

25 /s/MARK J. REICHEL for
26 SAMUEL WONG
Assistant U.S. Attorney
27 Attorney for Plaintiff

ORDER

____That the previously scheduled change of plea hearing date of May 31, 2005 be vacated and the matter set for change of plea on June 20, 2005 at 9:30 am.

The court finds that the interests of justice in granting the continuance outweighs the public's interest in a speedy trial and therefore time is excluded in the interests of justice pursuant to 18 U.S.C. § 3161 (H) (8) (B) (iv) and Local Code T4 and Local Code E.

IT IS SO ORDERED.

DATED: May 27, 2005

/s/ Frank C. Damrell Jr.

FRANK C. DAMRELL, JR.

United States DISTRICT JUDGE